

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-against-

MARTIN SHKRELI and EVAN GREEBEL,

*Defendants.*

ECF Case

No. 15-cr-00637 (KAM)

**ORAL ARGUMENT REQUESTED**

**DEFENDANT EVAN GREEBEL'S NOTICE OF MOTION FOR PROMPT  
DISCLOSURE OF *BRADY* MATERIALS**

Defendant Evan Greebel, by and through his undersigned counsel, hereby moves this Court to order the government to promptly disclose any and all *Brady* materials pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, including *Giglio v. United States*, 405 U.S. 150, 153-54 (1972), and *United States v. Bagley*, 473 U.S. 667, 676-77, 683 & n. 6 (1985), and the Fifth and Sixth Amendments to the United States Constitution.

This motion is based on this Notice of Motion, the accompanying Memorandum of Law, the accompanying Declaration of Lisa H. Rubin in Support of Mr. Greebel's Motions for a (1) Bill of Particulars and (2) Prompt Disclosure of *Brady* Materials, all other pleadings and papers on file in this action, and on such other matters as may be presented to the Court at the time of the hearing or before the ruling on this Motion.

Mr. Greebel respectfully requests oral argument on this motion.

Dated: New York, New York  
September 16, 2016

/s/ Reed Brodsky

Reed Brodsky  
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Lisa H. Rubin

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